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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street, 3rd floor New York, New York 10007

June 14, 2019

By ECF:

The Honorable Henry Pitman United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Michael T. Cohen, individually, and as the executor of the Estate of Arielle Hart

Cohen v. United States of America, No. 17 Civ. 7660 (LAK) (HBP)

Dear Judge Pitman:

I write jointly with plaintiff to provide a status update and respectfully request a further stay of this case while the parties seek authority from the Tax Division of the Department of Justice to resolve this matter.

Since the last status update, plaintiff and the government have agreed upon a figure to resolve the case that this Office can recommend to the Tax Division, which must approve any settlement in this matter. This approval process can take up to a few months. We therefore respectfully propose that, if the parties have not finalized their settlement by then (and presented it to the Court for its approval), they provide a further status update to the Court in two months, or by Friday, August 16. In the interim, we respectfully request that the Court maintain the stay in this action.

I thank the Court for its consideration of this request.

Respectfully,

GEOFFREY S. BERMAN United States Attorney

By: /s/ Peter Aronoff

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